

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED

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2006 APR 24 P 1:42

TAMMY WALKER
Plaintiff

Civil Action No: 05-30074-MAP

U.S. DISTRICT COURT
DISTRICT OF MASS.

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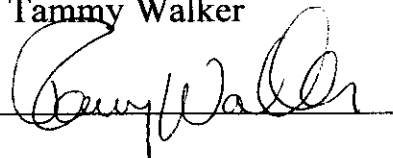
CITY OF HOLYOKE
Defendant

MOTION TO EXTEND DEPOSITIONS DEADLINES

Now comes the Plaintiff in the above captioned matter through pro se and hereby Moves this honorable Court to extend the non-expert depositions deadlines for Completion by May 19, 2006 for a period of thirty (30) days from the case conference, on May30, 2006 at 10:30 AM in courtroom three. The request to have these dates pushed back is due to an arbitration hearing scheduled for May 22, 2006 at 10:00 AM in the City Counsel Chambers in Holyoke, MA which I am forced to prepare on my own behalf (see attached letter from Union Lawyer Michael P. Clancy, Esq.) As well as having to preparing a appeal to the Commonwealth of Massachusetts Department of Labor and Workforce Development Board of review, which was due and completed on April 19, 2006. As I am pro se at this time, but discussing this case with an Attorney at this time regarding this civil matter. There is just not enough time to give reasonable time to serve the parties I would like to depose, and prepare for the up coming arbitration for IOD (Injured on duty status.) As I stated on January 12' 2006 I am having difficulty

in obtaining complete discovery from my former Attorney Tani E. Sapirstein, or
Chief Anthony R. Scott (See attached copies).

Respectfully Submitted,
The PLAINTIFF
By Tammy Walker

By 

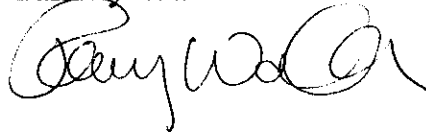
Tammy Walker
6 Clark Street
Holyoke, MA 01040
Phone: 413-533-1216

Dated April 24, 2006

I here by certify that a true copy of the above document was served upon the
following via certified mail.

Carole Sakowski Lynch, Esq.
Morrison, Mahoney LLP
1500 Main Street, Suite 2400
P.O Box 15387
Springfield, MA 0115-5387

Tammy Walker





INTERNATIONAL BROTHERHOOD OF POLICE OFFICERS

A DIVISION OF THE NATIONAL ASSOCIATION OF GOVERNMENT EMPLOYEES, AFL/CIO

1299 Page Boulevard
Springfield, MA 01104

(413) 732-3753
<http://www.ibpo.org>



April 6, 2006

Ms. Tammy Walker
6 Clark Street
Holyoke, MA 01040

CERTIFIED MAIL # 7002 2410 00061905 0360

Re: Injured on Duty Claim
Grievance: dated November 29, 2004

Dear Ms. Walker:

As you know, the arbitration hearing concerning the above-referenced matter is scheduled for a May 22, 2006 at 10:00AM in the City Counsel Chambers.

Following our last conversation, I contacted Meditrol as you requested seeking a copy of the medical file which you described. Enclosed please find the response.

There will be no continuance sought from this office. If you have additional documentary evidence, you need to take steps to secure it and provide it to me in advance of the scheduled arbitration. Further, as you know, this is your case to prove. You should plan on appearing at the arbitration prepared to testify on our own behalf.

Toward that end, I am willing to meet with you to prepare for the presentation. Please contact me at your earliest opportunity to let me know whether additional medicals will be made available and to determine a meeting schedule.

Thank you for your attention toward this matter.

Very truly yours,


Michael P. Clancy, Esq.

MPC/tg
Cc: Richard L. Barry, Jr., Esq.

Enclosures as stated



MICHAEL J. SULLIVAN
Mayor

Holyoke Police Department
138 Appleton Street
Holyoke, Massachusetts 01040-5706



ANTHONY R. SCOTT
Chief of Police

MEMBER OF:

October 20, 2005

CF 0972-05



CERTIFIED MAIL #7005 0390 0004 9004 6926
RETURN RECEIPT REQUESTED



Ms. Tammy Walker
6 Clark Street
Holyoke, MA 01040



Dear Ms. Walker:

I'm in receipt of your letter dated October 18, 2005, in which you once again request the following:

1. Copy of your personnel file;
2. Copy of your sick file;
3. Copy of your internal affairs file.



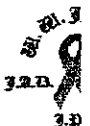
As an example, on July 14, 2005, your attorney at the time, Mr. Robert W. Berge, Esquire, requested the following information:

1. personnel record
2. qualification for employment
3. promotion
4. transfer
5. additional compensation
6. disciplinary action including:
 - a. job title and description
 - b. rate of pay and other compensation
 - c. starting date of employment
 - d. job application
 - e. performance evaluation
7. written warnings of substandard performance
8. probationary periods



Birthplace of Volleyball 1895

Telephone: (413) 322-6900 • Fax: (413) 322-6910 • Email: generalmail@holyokepd.org



9. waivers signed by the employee
10. dated termination notices
11. any other documents relating to disciplinary action

He was informed that items 1, 2, 3, 4, 6a, 6c, 6d, 7, 8, 10, and 11 were contained in your personnel file. Further, he was informed that items 5 and 6b are contractual in nature and contained in Local 409's labor contract and included as part of the documents requested. Mr. Berge was informed that item 6e was not included as there are no performance evaluations permitted by the labor agreement. As for item 9, I informed Mr. Berge that I had absolutely no idea of its meaning and therefore could not comply with his request.

Mr. Berge was informed that the cost for the items listed above was \$300.06 and included postage. As you have been provided a copy of your personnel file on previous occasions, should you wish another copy, your cost is as stated herein.

Your sick record consists of your yearly "Attendance Calendar" on which your attendance was maintained. This record consists of 15 pages from 1993 through April 2005. The cost for this copy is \$7.50, plus labor of \$5.03 and postage of \$.83 for a total of \$13.36.

As for the IAD files, your previous attorneys were provided, through discovery, a complete set of statements and the investigative reports on all disciplinary actions taken against you up to and including your termination and it is for this reason that I am not going to have these cases photocopied over again due to a conflict between you and your former attorneys.

Therefore, once I receive a check in the amount of \$313.42 I will mail you the records that enumerated herein.

Sincerely,



Anthony R. Scott
Chief of Police

ARS/jas

cc: Carole Sakowski Lynch, Esquire, Legal Counsel
Daniel J. Sheridan, Esquire, Labor Counsel
Daniel V. Bair, II, Esquire, Labor Counsel
Karen T. Betournay, Esquire, City Solicitor
Central Files

SAPIRSTEIN & SAPIRSTEIN, P.C.
ATTORNEYS AT LAW

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JONATHAN C. SAPIRSTEIN*
TANI E. SAPIRSTEIN*
CARLY L. MASSEY

TELECOPIER (413) 827-7797
EMAIL: FIRM@SANDSLAW.COM
WWW.SANDSLAW.COM

*ALSO ADMITTED IN CONNECTICUT AND NEW YORK

October 14, 2005

HAND DELIVERY

Ms. Tammy Walker
6 Clark Street
Holyoke, MA 01040
ATTORNEY/CLIENT COMMUNICATION
PRIVILEGED AND CONFIDENTIAL

Re: Tammy Walker v. City of Holyoke Police Department
Docket No. D-05-140

Dear Tammy:

Enclosed herewith please find the file in the above referenced matter. Please be advised that I have not retained a complete copy of the enclosed file, therefore you have the only copy of most of the documents in this matter.

Kindly acknowledge receipt of the enclosed file by signing the copy of this letter in the space provided below.

Very truly yours,



Tani E. Sapirstein, Esq.

I received a copy of my file
in the above referenced matter
on October 14, 2005.



Tammy Walker

*I will check to see if
any other are missing and
get back to you!*

